

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLES B. JOHNSON, :
as Trustee of the Johnson Family Trust, and :
TEMPLETON GLOBAL INCOME FUND :
 :
Plaintiffs, :
v. :
 :
SABA CAPITAL MANAGEMENT, L.P., : **JOINT STIPULATION AND**
SABA CAPITAL MANAGEMENT GP, LLC, : **[PROPOSED] ORDER**
SABA CAPITAL MASTER FUND, LTD., : **CONCERNING DISCOVERY**
BOAZ R. WEINSTEIN, KAREN :
CALDWELL, KETU DESAI, MARK :
HAMMITT, and ANATOLY NAKUM, :
 :
Defendants, :
and :
 :
FIRST COAST RESULTS, INC., :
 :
Nominal Defendant.
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Pursuant to the Court’s June 17, 2022 order (ECF No. 32) and Rules 16 and 26 of the Federal Rules of Civil Procedure, Plaintiffs Charles B. Johnson, as Trustee of the Johnson Family Trust, and Templeton Global Income Fund (“GIM” or the “Fund”), and Defendants Saba Capital Management, L.P., Saba Capital Management GP, LLC, Saba Capital Master Fund, Ltd., (each a “Saba Entity”), Boaz R. Weinstein (together with the Saba Entities, “Saba” or “the Saba Defendants”) respectfully submit this Joint Stipulation and [Proposed] Order Concerning Discovery.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, subject to the approval of the Court, that the following schedule shall govern proceedings in connection with Plaintiffs’ forthcoming motion for preliminary injunction:

	Event	Deadline
1.	Parties to serve written discovery requests and initial disclosures	June 27, 2022
2.	Parties to serve written responses and objections to discovery requests	July 1, 2022
3.	Substantial completion of document production – the parties have not agreed to expedited treatment of privilege logs	July 8, 2022
4.	Identification of opening experts and brief description of subject matter of report	July 12, 2022
5.	Deadline to complete fact witness depositions	July 22, 2022
6.	Deadline to exchange opening expert reports	July 25, 2022
7.	Deadline to exchange rebuttal expert reports	August 1, 2022

The parties may jointly agree to amend the dates set forth above by written agreement without Court approval. The parties reserve the right to move the Court to modify the above dates upon good cause shown.

IT IS HEREBY FURTHER STIPULATED AND AGREED, by and among the undersigned counsel, subject to the approval of the Court, that the parties shall be authorized to commence discovery and may seek discovery in any sequence from any source immediately.

Dated: New York, New York
June 23, 2022



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SO ORDERED:

Dated: _____

Hon. Analisa Torres
United States District Judge